PERSONAL DATA PROCESSING POLICY OF PROMOTORA SIMARUBA S.A.S.

First. Preliminary Considerations – The purpose of this legal instrument is to give effect to the constitutional right of all persons to know, update and rectify the information collected about them in databases or files, as well as the other constitutional rights, freedoms and guarantees referred to in Article 15 of the Political Constitution. In accordance with Law 1581 of 2012, the company, in its capacity as Data Controller, recognizes the importance of safeguarding the security, privacy and confidentiality of the personal information of its employees, clients, suppliers and other stakeholders, guaranteeing Data Subjects the full exercise of their fundamental right to Habeas Data.

Second. Identification of the Data Controller – The legally constituted entity acting as Data Controller of personal data, as defined in the applicable regulations, is the following:

Company Name: PROMOTORA SIMARUBA S.A.S.
Acronym: None reported.
Tax ID (NIT): 901.738.427-8
Principal Domicile: Cartagena, Bolívar, Colombia.
Address of Principal Domicile: Avenida Zona Norte, Km 8, vía al mar, Condominio BURANO, Torre 8, Apto 104, Serena Del Mar.
Email: gestor@simarubacartagena.com
Telephone: 3208607186

Third. Legal and Interpretive Definitions – For the correct interpretation and application of this policy, the following definitions, based on Law 1581 of 2012, are adopted:

- **Authorization:** Prior, express and informed consent of the Data Subject to carry out the Processing of personal data.
- **Database:** Organized set of personal data subject to Processing.
- **Personal Data:** Any information linked or that may be associated with one or more identified or identifiable natural persons.
- **Public Data:** Data classified as such by Law or the Constitution, and all data that is not semi-private, private or sensitive.
- **Private Data:** Information that, due to its intimate or confidential nature, concerns only the Data Subject.
- **Sensitive Data:** Data that affects the privacy of the Data Subject or whose misuse may lead to discrimination, such as data revealing racial or ethnic origin, political orientation, religious or philosophical beliefs, membership in trade unions or social organizations, or data relating to health, sexual life and biometric data.
- **Data Processor:** Natural or legal person who, alone or in association with others, carries out the Processing of personal data on behalf of the Data Controller.
- **Data Controller:** Natural or legal person who, alone or in association with others, decides on the database and/or the Processing of the data.

- **Data Subject:** Natural person whose personal data is subject to Processing.
- **Processing:** Any operation or set of operations on personal data, such as collection, storage, use, circulation or deletion.

Fourth. Guiding Principles of Processing – In its conduct, PROMOTORA SIMARUBA S.A.S. undertakes to subject the processing of personal data to the following inalienable principles, in compliance with the company's rules and policies on information protection and personal data privacy:

- **Principle of legality in data Processing:** Processing is a regulated activity subject to the provisions of the law and other provisions implementing it.
- **Principle of purpose:** Processing must serve a legitimate purpose in accordance with the Constitution and the law, which must be communicated to the Data Subject.
- **Principle of freedom:** Processing may only be carried out with the prior, express and informed consent of the Data Subject. Personal data may not be obtained or disclosed without prior authorization.
- **Principle of accuracy or quality:** Information subject to Processing must be truthful, complete, accurate, up to date, verifiable and understandable. The Processing of partial, incomplete, fragmented or misleading data is prohibited.
- **Principle of transparency:** Processing must guarantee the Data Subject's right to obtain from the Controller or the Processor, at any time and without restriction, information about the existence of data concerning them.
- **Principle of restricted access and circulation:** Processing is subject to the limits arising from the nature of the personal data and the provisions of the law and the Constitution.
- **Principle of security:** Information subject to Processing shall be handled with the technical, human and administrative measures necessary to secure the records, preventing their tampering, loss, consultation, use or unauthorized or fraudulent access.
- **Principle of confidentiality:** All persons involved in the Processing of personal data that is not public in nature are obliged to guarantee the confidentiality of the information, even after their relationship with any of the tasks involved in the Processing has ended.

Fifth. Purposes of the Processing of Personal Data – PROMOTORA SIMARUBA S.A.S. has established the following exhaustive and specific purposes for the processing of personal data, by virtue of its corporate purpose:

- The marketing, promotion and advertising of its project "SIMARUBA BEACH CLUB".
- Determining the client's payment or borrowing capacity, as well as analyzing payment and business alternatives, and entering into business, negotiation or payment agreements.
- Preparing, amending and executing contracts with clients.
- Offering and promoting to clients new businesses, current or future, in which the company acts as manager, builder, promoter or developer of projects, directly or indirectly.
- Carrying out its commercial activities in the construction and development of lawful real estate, civil and commercial projects.

- Complying with all legal, accounting, labor and contractual obligations arising from its existence and activity, and responding to judicial and administrative requests.
- Retaining and managing information on the commercial relationship with Data Subjects, including handling Petitions, Complaints and Claims (PQR).

Sixth. Rights of Data Subjects – Data Subjects, in accordance with the applicable regulatory framework, enjoy the following inalienable rights:

- To know, update and rectify their personal data before Data Controllers or Data Processors.
- To request proof of the authorization granted to the Data Controller.
- To be informed by the Controller or the Processor, upon request, of the use made of their personal data.
- To file complaints with the Superintendence of Industry and Commerce for violations of the provisions of the law.
- To revoke the authorization and/or request the deletion of data when the Processing does not respect constitutional and legal principles, rights and guarantees.
- To access their personal data that has been subject to Processing free of charge.

Seventh. Duties of PROMOTORA SIMARUBA S.A.S. – In its capacity as Data Controller, the company assumes the following unavoidable and non-delegable duties:

- To handle the data and information collected from the prospective buyer with the utmost care and absolute confidentiality.
- To guarantee the Data Subject, at all times, the full and effective exercise of the right of habeas data.
- To request and retain, under the conditions provided by law, a copy of the respective authorization granted by the Data Subject.
- To duly inform the Data Subject of the purpose of the collection and the rights they hold by virtue of the authorization granted.
- To retain the information under the security conditions necessary to prevent its tampering, loss, consultation, use or unauthorized or fraudulent access.
- To ensure that the information provided to the Data Processor is truthful, complete, accurate, up to date, verifiable and understandable.
- To inform the Data Subject, upon request, of the use made of their data.
- Not to disclose to third parties the personal or financial information obtained from its clients in the course of its business through the different information registration channels.
- To adopt an internal manual of policies and procedures to ensure proper compliance with the law and, in particular, for handling inquiries and claims.
- To comply with the instructions and requirements issued by the Superintendence of Industry and Commerce.

Eighth. Procedures for the Exercise of Rights – Every petition, inquiry or claim submitted by a Data Subject or their successors must be channeled through the area designated by the company. The procedure shall be subject to the following procedural rules, in accordance with Law 1581 of 2012:

Inquiries: Inquiries shall be answered within a maximum of ten (10) business days from the date of receipt. If it is not possible to answer the inquiry within this period, the interested party shall be informed before the deadline expires, stating the reasons for the delay and indicating the date on which the inquiry will be answered, which in no case may exceed five (5) business days following the expiration of the first period.

Claims: Claims shall be submitted by means of a request addressed to the Controller, including the identification of the Data Subject, a description of the facts, the address, and any supporting documents. If the claim is incomplete, the interested party shall be asked, within five (5) days of receipt, to correct the deficiencies. Once the complete claim has been received, a note reading "claim in process" shall be added to the database within no more than two (2) business days. The maximum period for addressing the claim shall be fifteen (15) business days from the day following the date of receipt. If it is not possible to address it within this period, the reasons and the new response date shall be communicated, which in no case may exceed eight (8) business days following the expiration of the first period. For a complaint to proceed before the Superintendence of Industry and Commerce, the Data Subject or successor may only file it once the inquiry or claim procedure before the Controller has been exhausted.

Ninth. Party Responsible for Implementation and Compliance – The Administrative and Financial Management area has been designated as responsible for receiving, handling and resolving all inquiries, complaints and claims from Data Subjects, in fulfillment of the duty to adopt an internal manual of policies and procedures. It may be contacted by email at gestor@simarubacartagena.com.

Tenth. Amendments to the Policy – PROMOTORA SIMARUBA S.A.S. reserves the right to amend this policy at any time. Substantial changes shall be communicated to Data Subjects at least five (5) business days in advance, by email, publication on the website or other suitable means. If they do not agree, Data Subjects may request the withdrawal of their information, unless a legal or contractual relationship prevents it.

Eleventh. Effective Date – This personal data processing policy has been in force since August 2025. Databases shall be maintained indefinitely, for as long as the company carries out its corporate purpose and as necessary to comply with legal obligations. Data may be deleted at the Data Subject's request, provided this does not contravene a current legal or contractual obligation.